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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARTHA DELIA MACIAS SANCHEZ, an
individual, CESAR IVAN MARQUEZ, an
individual;

Plaintiffs,

v.

FASHION SHOW MALL, LLC, a foreign
corporation; SCHINDLER ELEVATOR
CORPORATION, a foreign corporation;
MACY'S RETAIL HOLDINGS, LLC, d/b/a
MACY'S INC. and DOES I through X,
inclusive; and ROE CORPORATIONS I
through V, inclusive;

Defendants.

CASE NO.: 2:24-cv-02086-APG-EJY

**STIPULATION AND PROPOSED ORDER
TO EXTEND DISCOVERY (First Request)**

Pursuant to Federal Rule of Civil Procedure 29(b) and Local Rules IA 6-1, 7-1 and 26-3,
the parties hereby submit the following Stipulation and Order to Extend Discovery Deadlines (First
Request) to extend discovery deadlines and all related case management deadlines by sixty (60)
days.

I. Discovery Completed to Date.

1. Plaintiffs Initial Disclosure of Witnesses and Documents, served on January 21, 2025
2. Defendant Schindler Elevator Corporation's Initial Disclosure of Witnesses and
Documents, served on January 2, 2025
3. Defendant Macy's Retail Holdings, LLC and Fashion Show Mall, LLC Initial

1 Disclosure of Witnesses and Documents, served on January 30, 2025

2 4. Plaintiff's written discovery to Defendant Macy's Retail Holding was served on
3 February 5, 2025.

4 5. Schindler served written discovery Plaintiffs on February 28, 2025.

5 **II. Discovery Left to be Completed.**

6 1. Deposition of Plaintiffs.

7 2. Deposition of Defendant's 30(b)(6) Representative.

8 3. Deposition of percipient witnesses.

9 4. Disclosure of expert witnesses.

10 5. Deposition of Expert Witnesses.

11 **III. Reasons for Requested Extension.**

12 The parties request additional time to conduct discovery because of the complexity of the
13 parties involved in this matter, as well as the complexity of Plaintiffs medical records. Throughout
14 the current discovery period the parties have been working to investigate this incident in order to
15 streamline this case and dismiss unnecessary parties. Defendant Schindler on January 28, 2025 as
16 well as Defendant Fashion Show on February 24, 2025, proffered declarations to Plaintiffs
17 regarding their relationships with Defendant Macy's and maintenance of the subject escalator,
18 allowing Plaintiffs to better evaluate the scope of the subject Defendants' involvement. Defendant
19 Macy's also provided a declaration to Plaintiffs on February 6, 2025 It is anticipated that Plaintiff
20 will dismiss Defendant Fashion Show as a party without prejudice in this matter. The parties
21 anticipate that multiple experts will be necessary in this matter including medical experts, as well
22 as technical escalator experts.

23 Both of the Plaintiffs in this matter are continuing medical treatment; the parties are still
24 obtaining medical records and anticipate that independent medical exams may be necessary for
25 both Plaintiffs. Given the complexity of this matter the parties request an additional 60 days.

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IV. Current Deadlines and Requested Extension

	Current Deadline	Proposed Deadline
Amending Pleadings and Adding Parties	April 1, 2025	June 2, 2025
Initial Expert Disclosures	Plaintiff April 1, 2025 Defendant May 1, 2025	Plaintiff June 2, 2025 Defendant June 30, 2025
Rebuttal Expert Disclosures	All parties, June 2, 2025	All parties, August 1, 2025
Discovery Closes	June 30, 2025	August 29, 2025
Dispositive Motions	July 30, 2025	September 29, 2025
Pre-Trial Order, if no Dispositive Motions	July 30, 2025	September 29, 2025

DATED this 28th day of February 2025

ATKINSON WATKINS & HOFFMANN, LLP

/s/ Tyler M. Crawford, Esq.

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Fashion Show Mall, LLC and Macy's Retail

Holdings, LLC

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Attorneys for Defendant

Schindler Elevator Corporation

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: February 28, 2025